

November 17, 1997

CAL No. 1-97-007 (Supplement)

Mr. Ted C. Feigenbaum
Executive Vice President and Chief Nuclear Officer
c/o Mr. R. A. Mellor, Director
Site Operations and Decommissioning
Connecticut Yankee Atomic Power Company
362 Injun Hollow Road
East Hampton, Connecticut 06424-3099

SUBJECT: CONFIRMATORY ACTION LETTER, SUPPLEMENT

Dear Mr. Feigenbaum:

On March 4, 1997, the NRC issued Confirmatory Action Letter (CAL) 1-97-007 due to significant deficiencies and weaknesses that were identified in your radiological control program. As described in that CAL, you agreed to certain actions to effect performance improvement, including the conduct of an independent assessment of your radiological controls program; determination of problems, root causes, and corrective actions; and the establishment of a plan and schedule for radiation protection program improvement. Additionally, you agreed to establish and implement interim compensatory measures to assure sufficient management, control, and oversight of radiological activities until program improvement was achieved; and to meet with the Regional Administrator prior to eliminating any of those compensatory measures.

Since that time you have initiated and completed several activities described in the CAL, including an independent assessment of the radiological control program, and the consequent development of a comprehensive Radiation Protection Improvement Plan. This plan included efforts to: (1) establish improved standards and expectations and effectively communicate them to your staff; (2) strengthen the radiological work planning and control process; (3) establish effective control of radioactive materials; (4) improve radiological work procedures; (5) improve radiation worker training and qualification; (6) improve self-assessment activities; and (7) increase sensitivity to, and control of, transuranic activity.

In a meeting on October 31, 1997, you described the status of your program improvements, corrective actions accomplished, process changes implemented, and results achieved. While recognizing that some process improvement efforts are still in progress, you expressed your view that your organization has made sufficient progress to successfully conduct more significant radiological work. Accordingly, you requested NRC approval to conduct an Artifact Removal Project (the removal of an 8-foot section of Letdown System piping for the purpose of sectioning the pipe for testing various vendor

system decontamination processes). Subsequently, in correspondence to the NRC dated November 13, 1997, Updated Response to Confirmatory Action Letter, you proposed revised administrative controls (compensatory measures) to replace those that were described in your letter to the NRC dated March 7, 1997.

From review of your latter submittal, we understand that you remain committed to restrict work in the Radiological Controlled Area to that which is essential to maintain the plant in a safe manner and configuration. The minor revisions principally affect: (1) the level of management that may approve such work (previously an Officer or Director, now the Radiation Protection Supervisor for routine tasks; and the Health Physics Manager for higher risk activities); (2) the elimination of a security guard at the protective area exit (previously a guard was stationed for the purpose of verifying that all materials were surveyed prior to leaving the area); and, (3) minor changes in some prerequisites for establishing certain administrative controls.

Since issuance of the Confirmatory Action Letter, our inspectors have conducted several inspections and confirmed that, while improvement efforts are still in progress, you have achieved program improvement in several areas. We have observed the establishment of better standards and improved communication of expectations, improved radiation monitoring system calibration and use, improved work planning and pre-job briefings, more effective development and use of Radiation Work Permits, enhanced control of radioactively contaminated materials, improved radiological survey performance, better radiation worker training and qualification, improved procedures, and better adherence to procedural requirements.

Based on our inspection findings and observations, we agree that your organization has made sufficient progress in radiation protection program improvement to conduct more significant radiological work. Accordingly, we have reviewed your plans, procedures, and preparations relative to the Artifact Removal Project. This activity provides an opportunity to demonstrate the ability of your organization to effectively implement your radiation protection program and safely conduct significant radiological work. Therefore, we agree with your plan to perform this task. We will observe and inspect your performance to determine the effectiveness of your program improvements.

Additionally, in view of your accomplishments to date, we agree with your proposed changes in administrative controls. However, it is important that your organization continue to aggressively pursue completion of the remaining elements of your Radiation Protection Improvement Plan. Our inspectors will continue to inspect your performance in this area to verify your efforts.

Pursuant to a telephone discussion on November 17, 1997 between Mr. Gary Bouchard of your organization, and Mr. John White of my staff, we understand that, unless otherwise agreed to by the NRC, you plan to only conduct radiological work activities that are essential to the safe maintenance of the facility, as specified in your November 13, 1997 correspondence to the NRC. This restraint will remain until our inspectors have confirmed that your organization has successfully completed radiation protection program improvement in accordance with your plan. Except as described by this letter, all other stipulations of the

Mr. Ted C. Feigenbaum

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Confirmatory Action Letter remain as stated.

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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be placed in the NRC Public Document Room (PDR).

Sincerely,

/signed/

Hubert J. Miller
Regional Administrator
NRC Region I

Docket No. 50-213

License No. DPR-61

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